

November 13, 2022

Honorable LaShann DeArcy Hall
United States District Judge for
the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Derrick Taylor*, 22 Cr. 311 (LDH)

Hon. DeArcy Hall,

With consent of the government and counsel for the three remaining defendants (Mr. Lui, Mr. Ziburis and Mr. Taylor), I write to request a 45-day continuance of the November 15, 2022, status conference in this case.¹ Each defense counsel needs additional time to review discovery which is both voluminous and cumbersome to review.

Should the Court grant this request, the parties agree that the time is properly excluded under the Speedy Trial Act because the parties continue to engage in plea discussions. To that end, we request that the time between November 15, 2022, and the next date set by the Court, be excluded under the Speedy Trial Act, pursuant to Title 18, United States Code, section 3161(h)(1)(D) and 3161 (h)(7)(A). Excluding time will best serve the ends of justice and outweigh the best interests of the public and the defendant in a speedy trial, because it will allow the government and defense counsel for each defendant to continue discussions regarding a possible disposition in the matter, or in the alternative responsibly prepare for trial.

Each counsel has discussed with their respective client the exclusion of time under the Speedy Trial Act, and agrees that such an exclusion is in the interest of the public and their client.

I thank the court for its time and consideration of this matter.

Respectfully submitted,

/s/Sabrina P. Shroff
Attorney for Derrick Taylor

¹ The fourth defendant, Mr. Miller is scheduled for a guilty plea before Magistrate Judge Scanlon on November 14, 2022 . The fifth defendant, Qiang Sun is not before this Court.